BELLSOUTH

REC'S TN

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General Counsel

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EQUITIVE SECRETARY

July 2, 2002

VIA E-MAIL

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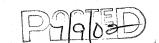
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Re:

BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996
Docket No. 97-00309



97-00309 BellSouth 271 Application July 2, 2002 Page 2

Dear Counsel:

Enclosed are BellSouth's supplemental responses to Consolidated CLEC 1st Data Requests Items No. 3, 7, 8, 44 and 60. The attachment to the response to Item 7 contains proprietary information, is being provided to you under separate cover (with the exception of Mr. Isar), and is subject to the terms of the Protective Order entered in this proceeding. Additional supplemental responses will be provided to you as soon as possible.

Very truly yours,

Guy M. Hicks

GMH:ch



BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
Consolidated CLEC 1st Data Requests
May 23, 2002
SUPPLEMENTAL Item No. 3
Page 1 of 1

REQUEST:

Please provide supplemental responses to covering the period July 1, 2001

to April 30, 2002, to Interrogatories Nos. 5, 6, 16, 17, and 18, from

AT&T, SECCA, Brooks Fiber, MCImetro, WorldCom, Time Warner, XO

Tennessee, and Covad which were served on August 21, 2001.

RESPONSE: See attached.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
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SUPPLEMENTAL Item No. 3
ATTACHMENT

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
AT&T, SECCA, WorldCom, Time Warner, XO, Covad's

1st interrogatories
August 21, 2001
SUPPLEMENTAL Item 16
(Consolidated Request No. 3)
Page 1 of 1

REQUEST:

For the months of January 2001 through July 2001, please state, by month, the percentage of coordinated cutovers that involved IDLC in Tennessee and in each of the other states in BellSouth's region.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

The systems in which the requested information is retained, only retains this type of information for 60 days. Consequently, the data for August 2001 through March 2002 is not currently in BellSouth's possession, custody or control. In BellSouth's previous work effort, BellSouth manually reviewed every order involving Coordinated Cutovers for these months in all nine states to identify whether IDLC was involved.

Below is a table summarizing the data for coordinated cutovers that involved IDLC in each of the other states in BellSouth's region for the months available.

STATE		
	7/01	04/02
AL	9.4%	0%
GA	15.4%	28.8%
KY	50%	0%
LA	4.6%	10.9%
MS	15%	50%
NC / SC	26.5%	23.7%
FL	40.5%	34.3%
TN	19.1%	20.6%

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
Consolidated CLEC 1st Data Requests
May 23, 2002
SUPPLEMENTAL Item No. 7
Page 1 of 1

REQUEST: From the time period July 2001 to the present, please describe:

- 1. How many separate times BellSouth disconnected interconnection trunks in Tennessee and each of the other states in BellSouth's region. This includes reducing the size of existing trunk groups by disconnecting members of the trunk group;
- 2. In what specific locations did BellSouth disconnect interconnection trunks in Tennessee and each of the other states in BellSouth's region;
- 3. Which of the trunk disconnects provided in question 1 were AT&T and how many days notice did we give them?
- 4. In how many of these instances did BellSouth await a response from AT&T that the disconnect was appropriate?
- 5. What method of communication does BellSouth utilize to communicate such disconnect activities to AT&T?

RESPONSE:

1.	Alabama	175	Mississippi	38
	Florida	786	North Carolina	265
	Georgia	525	South Carolina	103
	Kentucky	61	Tennessee	180
	Louisiana	116		100

- 2. This information is proprietary and the attached is being provided subject to the terms of the Protective Order entered in this proceeding.
- 3. Of the number of times trunks were disconnected in each state in response to question 1, the following are the number of times BellSouth disconnected AT&T trunks:

Florida	108	North Carolina	25
Georgia	2	South Carolina	7
Kentucky	8	Tennessee	15
Louisiana	3		1.0

For each of the above disconnects, the attached proprietary information contains the dates the ASR was sent to AT&T, the date the FOC was received and the Due Date of the disconnect.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
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RESPONSE: (Cont.)

- 4. BellSouth awaited a response from AT&T in all instances.
- 5. BellSouth utilizes the Access Service Request (ASR) process to communicate the specific disconnect activities. For situations involving underutilization, the Local Interconnection Service Center (LISC) Project Manager calls the CLEC to discuss the underutilization of the trunk group and the number of trunks that BellSouth wishes to disconnect. The information is sent by e-mail or by facsimile to the designated interface. The CLEC is asked to provide concurrence with the disconnect in 7 business days or to provide specific information on additional traffic that it is to bring on to the trunk group.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
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Consolidated CLEC 1st Data Requests
May 23, 2002
SUPPLEMENTAL Item No. 7
ATTACHMENT

PROPRIETARY

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
Consolidated CLEC 1st Data Requests
May 23, 2002
SUPPLEMENTAL Item No. 8
Page 1 of 1

REQUEST: Describe the process used by BellSouth for determining the date when BellSouth begins charging CLECs for power usage.

(a) Do these charges begin at the time that power is drained by the CLEC or when the CLEC accepts the collocation cage?

(b) Please identify, by collocation site, the actual power drain incurred by AT&T and the corresponding feeder fuse size placed, as follows:

S I T E - X	Actual Drain Fused Ampara
When Power Charges begin (date)	Actual Drain Fused Ampere
At 3 months after cage acceptance	
At 6 months after cage acceptance	
At 1 year after cage acceptance	
At 18 months after cage acceptance	

RESPONSE: (a) BellSouth begins billing the CLEC for the power it requested on its BFFO at the Space Ready Date or the date that the CLEC accepts the space, whichever is sooner.

(b) BellSouth does not measure CLEC power drains and does not have historical records of CLEC's power drains. Listed below is the equipment drain and protection device size requested by AT&T in its collocation applications.

S I T E X	L-1 Drain Requested by AT&T	Protection Device Size Requested by AT&T
NSVLTNCH	101	450
NSVLTNST	122	450
NSVLTNBW	122	450
NSVLTNUN	122	125
NSVLTNMT	239	225
CHTGTNBR	122	225
CHTGTNDT	153	
CHTGTNNS	212	225
KNVLTNBE	202	225
KNVLTNMA	209	225
KNVLTNWH	182	225
MMPHTNMA	27	225
	41	225

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 97-00309 Consolidated CLEC 1st Data Requests May 23, 2002 SUPPLEMENTAL Item No. 44 Page 1 of 1

REQUEST:

From January 2002 to April 2002, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the volume of LSRs (segregated by manual and electronic) and the volume of issued service orders by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories:

- a. LNP;
- b. UNE:
- c. Business Resale:
- d. Residence Resale; and
- e. Total (i.e., UNE, Business Resale, and Residential Resale combined)

RESPONSE: Please find attached BellSouth's aggregate volume for LSRs submitted manually from January 2002 to April 2002. The aggregate volumes include the following categories: LNP, UNE, Business Resale, and Residence Resale. Also included are the service order volumes for the respective categories.

> Please see attached for January to April 2002 state specific manual LSR volumes.

Please see response to Data Request No. 43 for the volume of LSRs submitted electronically and the volume of issued service orders as requested.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
Consolidated CLEC 1st Data Requests
May 23, 2002
SUPPLEMENTAL Item No. 44
ATTACHMENT

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
Consolidated CLEC 1st Data Requests
May 23, 2002
SUPPLEMENTAL Item No. 44
ATTACHMENT

AL	Segment	Manual LSR Volume	Service Order Volume
Jan-02	LNP	504	23
	Business	172	31, 34
	Residence	91	13
	UNE	2439	667
	TOTAL	3206	734

FL	Segment	Manual LSR Volume	Service Order Volume
Jan-02	LNP	1652	169
	Business	1/194	159
	Residence	1432	320
	UNE	7047	3649
,	TOTAL	11325	4297

GA	Segment	Manual LSR Volume	Service Order Volume
Jan-02	LNP	articles at an experience of the same of t	143
450	Business	372	No. 20 September 1
	Residence	183/- /	2/36
	UNE	8637	3245
	TOTAL	8577	3469 3469

KY	Segment	Manual LSR Volume	Service Order Volume
Jan-02	LNP		
	Business	145	1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Residence	117	10
वहीं संस्थान है। इस हार के किस स्वास्त्री के किस	UNE	500 tu	211 44
	E. TOTAL	853	248

JA 📑	Segment	Manual LSR Volume	Service Order Volume
Jan-02	LNP	13: F 806	194
- 2A # 1	Business	192	8
	Residence	60	11 (11 (11 (11 (11 (11 (11 (11 (11 (11
h. Latins	UNE	1435	598
	TOTAL	2491	811

MS	Segment Manual LSR Volume Service Order Volume
Jan-02	LNP 162
	Business 120 August 714
- 10 m	Residence 83 1 4
	UNE 592 - 219 219
· Jane 1	TOTAL 985 282

NC Segment	Manual LSR Volume Service Order Volume
Jan-02 LNP	623 82 82 W
Business	207 20
Residence	67. AC. (1944)
UNE	1990 M
TOTAL	2887 1150 1 1015

SC	Segment	Manual LSR Volume	Service Order Volume
Jan-02	LNP	299	
	Business	130	31
	Residence	Nation 184	29
	UNE	906	· 280
	TOTAL	1469	957

TN:	Segment	Manual LSR Volume	Service Order Volume
Jan-02	LNP	784	189
ingress Line that	Business	192	20
	Residence	66 🚉	44
	UNE	2224	915
1	TOTAL	3266	1/136

Appregate		Manual LSR Volume	Service Order Volume
Jan-02	LNP	6326	871
4000	Business	2782	355
	Residence	2233	440
	UNE	23768	10683 Pag
	TOTAL	35059	12349

AL	Segment	Manual LSR Volume	Service Order Volume
Feb-02	LNP	The second secon	with the second
	Business	89	23
	Residence	117	13
	UNE	1200	375元
	TOTAL	1933	425.00

FL	Segment	Manual LSR Volume Service Order Volume
Feb-02	LNP	1172
	Business	933
	Residence	942 202
	UNE	6479 2817
	TOTAL	9526 3218

GA	Segment	Manual LSR Volume	Service Order Volume
Feb-02	LNP		21,
	Business	367	30.4.3.
4.2855 1.	Residence	190	ar alberta . Mary 1985
	UNE		2737+ sea
	TOTAL	8640	2826

KY	Segment	Manual LSR Volume	Service Order Volume
Feb-02	LNP		3
an wantan d	Business		19
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Residence	2. 27.	16:22
Terastin ja	UNE		245
	TOTAL	729	278

LA	Segment	Manual LSR Volume Service Order Volume
Feb-02	LNP	
	Business	89 10
A	Residence	98
	UNE	1161 508
100 - 11 - 14 - 15 - 15 - 15 - 15 - 15 - 15	TOTAL	1939 607

MS	Segment	Manual LSR Volume Service Order Volume
Feb-02	LNP	165 53 44 44 53
7. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	Business	
~#** LL	Residence	
	" UNE	
	TOTAL	972 359

NC	Segment	Manual LSR Volume	Service Order Volume
Feb-02	LNP	the second secon	88
	Business	211	
12,274	Residence		2.
	UNE	CONTRACTOR OF THE PROPERTY OF	796
	TOTAL		917(3)

SC -	Segment	Manual LSR Volume	Service Order Volume
Feb-02	LNP	323	20
a made a deliber	Business	65	19
	Residence	173	24
	UNE	702	297
Į.	TOTAL	1263	354

TN	Segment	Manual LSR Volume Service Order Volume
Feb-02	LNP	
	Business	128
4.	Residence	84 3
	UNE	2207 950
	TOTAL	2999 1047

Appregate	Segment	Manual LSR Volume	Service Order Volume
Feb-02	LNP	5138	470
Jan Alija Jana Jana	Business	2146	263
	Residence	1871	913
	UNE	21692	8983
The Control of State	TOTAL	30847	10029

AL	Seoment	Manual LSR Volume: Service Order Volume:
Mar-02	LNP	440 26
	Business	136
The second of th	Residence	105 21
	UNE	828 318
1. 1. 1. 1. 1. 1. 1.	TOTAL	1509 389

FL	Segment	Manual LSR Volume	Service Order Volume
Mar-02	LNP	1102	30
	Business	1093	147
	Residence	821	168
	UNE	7708	3217
	TOTAL	10724	3560

GA	Segment	Manual LSR Volume	Service Order Volume
Mar-02	LNP		27
	Business	277	28
	Residence	1. 1. 20.10.10.10.10	39.
*	UNE		2403
1,45.1	TOTAL	8450	2497

KY	Segment	Manual LSR Volume Service Order Volume
Mar-02		
	Business	
200 10 10 10 10 10 10 10 10 10 10 10 10 1	Residence	103 29
1. 人名英格兰人名	UNE	411
	TOTAL	684

LA	Segment	Manual LSR Volume Service Order Volume
Mar-02		500 - 100 ATT
	Business	122 25
F. (2) 1-14/5 (1) 1/4	Residence	106 - 17
- Raight Ann	UNE	1140 488
Seether to the Control	TOTAL	1845 607

MS	Segment	Manual LSR Volume	Service Order Volume
Mar-02	LNP	222	69
- 'Ye' (34 .)		The second secon	21
- 144	Residence	65***	15
	- UNE	481	· 1974 / 244 miles
	TOTAL	868	349

NC	Segment	Manual LSR Volume Service Order Volume
Mar-02	LNP	O. M. C.
10 V	Business	the second of th
12 Mars.	Residence	
	UNE	
	TOTAL	3615 77 2

SC 🕝	Segment	Manual LSR Volume	Service Order Volume
Mar-02	LNP	268	
11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Business	96	
	Residence	107	.18
	UNE	691	367
	TOTAL	1162	404

TN	Segment	Manual LSR Volume	Service Order Volume
Mar-02	LNP	497	54) (c)
**	Business	184	20
	Residence	81 Sept. 47-32	6 3
	UNE	2133	716
18.4	TOTAL	2895	796

Aggregate	e a single	Manual LSR Volume	Service Order Volume
Mar-02	LNP	4821	534
W	Business	2274	318/2
	Residence	1657	322
3 - 1 1 3	UNE	23000	9033
	TOTAL	31752	10207

AL SM	Segment	Manual LSR Volume Service Order Volume
Apr-02	LNP	435
	Business	157
	Residence	461
4323.44	UNE	.934 368
1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	TOTAL	1677 442

FL	Segment	Manual LSR Volume	Service Order Volume
Apr-02	LNP	1510	154
	Business		103
	Residence	- 1007	189
- 17 (A)	UNE		4341
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	TOTAL	11047	4787

GA	Segment	Manual LSR:Volume	Service Order Volume
Apr-02	LNP	1002	79
	Business	433	37
	Residence	484	51
	UNE	6736	2386
-3784	TOTAL	8655	2547 W

KY.	Segment	Manual LSR Volume	Service Order Volume
Apr-02	LNP	116	3
	Business	104 中華主義	7. 4.
Linear Coletta	Residence	103	29
	UNE	344	154
	TOTAL	667	193***

LA	Segment	Manual LSR Volume Service Order Volume
Apr-02	LNP	628 102/4/7
	Business	
	Residence	130 " 12 " 12 " 12 " 12 " 12 " 12 " 12 " 1
	UNE	921
	TOTAL	1816

MS	Segment	Manual LSR Volume	Service Order Volume
Apr-02	LNP	259	105 march
125 25 0 7 9	Business	e é (26 s 2 / 21 17 .	27
	Residence	71 % 386-	6 of the
	" UNE		221 -
	TOTAL	843	365

NC Segment	Manual LSR Volume Service Order Volume
Apr-02 LNP	684 4 162
Business	218 4 35
Residence	74 6 "
UNE	1816
TOTAL	2792 1082

se-	Segment	Manual LSR Volume Service Order Volume
Apr-02	LNP	302
	Business	14679
	Residence	119 26
	UNE	860 383
	TOTAL	1397 425

TN	Segment	Manual LSR Volume	Service Order Volume
Apr-02		418	- 44
	Business	100	5
raine const	Residence	101	8
	UNE	1778	349
Straighten di	TOTAL	2397	606

Aggregate		Manual	LSR	Volume	Service Order Volume
Apr-02	LNP		5354		712
	Business	. Carrie	2289)	251
2,44	Residence		224(344
.	UNE		2140	8	19649
12 Mars 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	TOTAL		3129	1	10956

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 97-00309 Consolidated CLEC 1st Data Requests May 23, 2002 SUPPLEMENTAL Item No. 60 Page 1 of 1

REQUEST:

State whether you contend that cageless physical collocation may not be provisioned in a shorter interval than caged physical collocation. If so, state each and every fact that supports your position.

RESPONSE: BellSouth does not contend that cageless physical collocation may not be provisioned in a shorter interval than caged physical collocation. Most of the state commissions in the BellSouth Region that have ordered specific provisioning intervals for physical collocation have recognized that additional time is required to construct the cage for a CLEC that requests a caged enclosure for its collocation arrangement. Therefore, BellSouth would support a cageless collocation interval of thirty (30) calendar days from receipt of a Bona Fide Firm Order when conditioned space is available and the CLEC installs its own rack/bays and a caged collocation interval of ninety (90) calendar days from receipt of a Bona Fide Firm Order in the state of Tennessee.

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2002, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

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